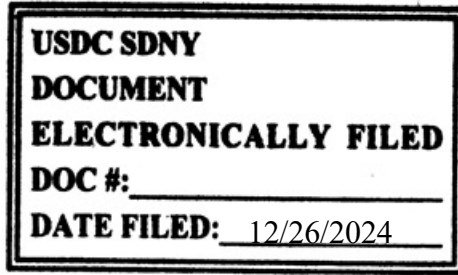


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December 20, 2024

VIA ECF

Honorable Margaret M. Garnett, U.S.D.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Centerpark Services, LLC v. IBT Local 272
Docket No.: 24-cv-09748-MMG
First Request for Extension of Filing Deadline

Dear Judge Garnett:

This firm represents Defendant Garage Employees Union Local No. 272, International Brotherhood of Teamsters (hereinafter, "Union") in the above-referenced action brought by Centerpark Services, LLC (hereinafter, "Centerpark") (collectively, "Parties").

In conformance with Sections I(B)(1) and (5) of Your Honor's Individual Rules of Practice in Civil Cases, I write to request a 2-week extension of the current December 30, 2024 deadline for the Union to answer, move, or otherwise respond to the Plaintiff's Petition Seeking a Stay of Arbitration originally filed in N.Y.S. Supreme Court, which the Union removed to this Court on December 18, 2024. (Dkt. 1, Exh. "A" and "D").

The undersigned attorney requests this extension because of the filing deadlines overlapping with the intervening holiday season, which impact and limit office hours and access to resources during said time. Thus, this adjournment is requested for good cause and is not for dilatory reasons.

Please be also advised that: i) this is the first time a request for an extension of this nature is being made; ii) the reason for the instant request is set forth above; iii) Plaintiff consents to the instant request; and iv) the granting of the instant request will not affect any previously-scheduled judicial deadlines for appearances or conferences. Please be additionally advised that if the instant

request is graciously granted, the above-referenced deadline will be extended from December 30, 2024 to January 13, 2025.

The undersigned thanks the Court for the time and attention to the issue presented herein.

Respectfully submitted,

s/JOSEPH M. BONOMO

Joseph M. Bonomo

cc: Michael T. Madaio, Esq., Counsel for Plaintiff (*via ECF*)

GRANTED. The Defendant's time to respond to the Complaint is hereby EXTENDED until **January 13, 2025**.

SO ORDERED. Dated December 26, 2024.

A handwritten signature in black ink, appearing to read 'Margaret M. Garnett', is written over the typed name.

HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE